

GOODSILL ANDERSON QUINN & STIFEL  
A LIMITED LIABILITY LAW PARTNERSHIP LLP

BARBARA A. PETRUS 3238-0

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Attorneys for Plaintiff

JOHN A. MOFFETT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, a Maryland corporation; TOM CAFFREY; RUBY CAFFREY; DOE CORPORATIONS 1-20; DOE PARTNERSHIPS 1-20; DOE ENTITIES 2-10; JOHN DOES 1-20; JANE DOES 1-20; DOE GOVERNMENTAL AGENCIES 1-20,

Defendants.

CIVIL NO. 03-00130 HG/BMK

PLAINTIFF'S FINAL PRETRIAL STATEMENT; CERTIFICATE OF SERVICE

DATE: MAY 3, 2005

TIME: 9:00 A.M.

JUDGE: HON. BARRY M. KURREN

TRIAL: JUNE 14, 2005

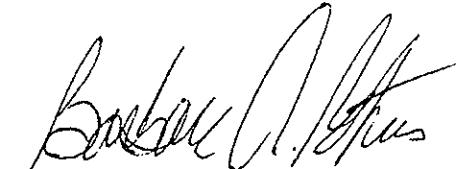
JUDGE: HON. HELEN GILLMOR

WITNESS	TESTIMONY
	Monica Nelson's complaint to him about sexual harassment; his knowledge of Plaintiff's complaint to him about the sexual harassment of Nelson and of other illegal and/or improper activities at Defendant SMF Systems; his knowledge of Defendants' failure to respond to those complaints; his knowledge of Plaintiff's termination from employment and his knowledge of the October 2000 e-mail from Plaintiff to Defendants Tom and Ruby Caffrey regarding Plaintiff's complaints.
Nekoorad-Long, Haleh	Will testify as to liability and damages including, but not limited to: her treatment of Plaintiff.
Nelson, Monica	Will testify as to issues of liability including, but not limited to: her employment at SMF and Fort Shafter; the harassment by Millard and Wes Green; her reports of the harassment to Nehmad; SMF's response to her reports of harassment; her giving Plaintiff authority to act on her behalf as to the harassment; her knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; her participation in government investigations into Millard and SMF; and her termination from SMF.
Noel, Peter	Will testify as to issues of liability including, but not limited to: his employment at SMF and Fort Shafter; his knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; his participation in government investigations into Millard and SMF; his knowledge of Plaintiff's work at SMF; the hiring of Langley as project manager.
O'Brennan, Laura	Will testify as to issues of liability including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal

**V. MISCELLANEOUS**

Not applicable.

DATED: Honolulu, Hawaii, April 26, 2005.



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BARBARA A. PETRUS  
DONNA H. KALAMA  
ANNE T. HORIUCHI BELL

Attorneys for Plaintiff  
JOHN A. MOFFETT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, a  
Maryland corporation; et al.,

Defendants.

CIVIL NO. 03-00130 HG/BMK

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was duly served on this date  
upon the following person(s) at the address(es) listed below by the means  
indicated:

	Mail	Hand Delivery
LYNNE T. T. TOYOFUKU, ESQ.	X	
NICHOLE K. SHIMAMOTO, ESQ.		
Marr Hipp Jones & Wang		
1001 Bishop Street, 1550 Pauahi Tower		
Honolulu, HI 96813		
H. CLYDE LONG, ESQ.	X	
950 Risa Road, 2 <sup>nd</sup> Floor		
LaFayette, CA 94549		

DATED: Honolulu, Hawaii, April 26, 2005.



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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

AUG 01 2005

at 3 o'clock and 50 min P M  
SUE BEITIA, CLERK

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JOHN A. MOFFETT

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FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, a Maryland corporation; TOM CAFFREY; RUBY CAFFREY; DOE CORPORATIONS 1-20; DOE PARTNERSHIPS 1-20; DOE ENTITIES 2-10; JOHN DOES 1-20; JANE DOES 1-20; DOE GOVERNMENTAL AGENCIES 1-20,

Defendants.

CIVIL NO. 03-00130 MLR/BMK

PLAINTIFF'S FIRST AMENDED FINAL PRETRIAL STATEMENT;  
CERTIFICATE OF SERVICE

TRIAL: SEPTEMBER 19, 2005  
JUDGE: HON. MANUEL L. REAL

WITNESS	TESTIMONY
Nekoorad-Long, Haleh	Will testify as to liability and damages including, but not limited to: her treatment of Plaintiff.
Nelson, Monica	Will testify as to issues of liability including, but not limited to: her employment at SMF and Fort Shafter; the harassment by Millard and Wes Green; her reports of the harassment to Nehmad; SMF's response to her reports of harassment; her giving Plaintiff authority to act on her behalf as to the harassment; her knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; her participation in government investigations into Millard and SMF; and her termination from SMF.
Noel, Peter	Will testify as to issues of liability including, but not limited to: his employment at SMF and Fort Shafter; his knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; his participation in government investigations into Millard and SMF; his knowledge of Plaintiff's work at SMF; the hiring of Langley as project manager.
O'Brennan, Laura	Will testify as to issues of liability including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal Brigade at Fort Shafter, Hawaii.
Olsen, Matthew	Will testify as to issues of liability, including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal Brigade at Fort Shafter, Hawaii.
Pay, Peter	Will testify as to issues of liability including, but not limited to: his knowledge of Defendant SMF Systems' corporate structure, its business in Hawaii, and of its relationship to SMF Systems Technology Corporation.

2005.

**T. ESTIMATE OF TRIAL TIME**

Plaintiff estimates that trial of this matter will take between 8 and 10 court days.

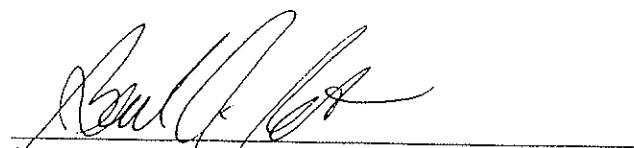
**U. CLAIMS OF PRIVILEGE OR WORK PRODUCT**

None of the matters required to be stated by LR16.6 are claimed to be privileged or work product.

**V. MISCELLANEOUS**

Not applicable.

DATED: Honolulu, Hawaii, August 1, 2005.



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ANNE T. HORIUCHI BELL

Attorneys for Plaintiff  
JOHN A. MOFFETT

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CERTIFICATE OF SERVICE

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DATED: Honolulu, Hawaii, August 1, 2005.



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JOHN A. MOFFETT